

**UNITED STATES DISTRICT COURT FOR THE
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

UNITED STATES OF AMERICA

v.

**JACK STEPHEN PURSLEY,
AKA STEVE PURSLEY,
Defendant.**

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**CRIMINAL NO. 4:18-CR-575
(HUGHES)**

**GOVERNMENT’S NOTICE OF INTENT TO INTRODUCE 404(b) EVIDENCE
– SES PANAMA**

The United States of America, by and through undersigned counsel, files this Notice of Intent to Introduce Evidence under Federal Rule of Evidence 404(b). While the Government believes that the events described below are inextricably intertwined with the offense conduct, and are therefore admissible, we submit this notice in order to satisfy Rule 404(b)’s notice requirements.

From 2007 through 2010, defendant Pursley structured the movement of millions of dollars from the Isle of Man bank accounts owned by Co-Conspirator 1 to accounts in the United States in the names of domestic corporations owned by defendant Pursley and Co-Conspirator 1. Co-Conspirator 1’s Isle of Man company was called Southeastern Shipping Company Ltd. Co-Conspirator 1 and a business associate formed the original Southeastern Shipping Company in Nevis in or about 1997, and employed Co-Conspirator 1 as a consultant. Co-Conspirator 1 assumed sole control of the business from the business associate and determined he needed to re-form the business.

Defendant Pursley advised Co-Conspirator 1 that he (Pursley) had a bank account in Panama and recommended that Co-Conspirator 1 go there too. Co-Conspirator 1 traveled to Panama with defendant Pursley and opened a bank account for Southeastern Shipping Panama at Pursley’s Panamanian bank called Banco Disa. In April 1999, Co-Conspirator 1 formed

Southeastern Shipping Panama, International Group, S.A., as a Panamanian company. Co-Conspirator 1 traveled with defendant Pursley to Panama a few times. Co-Conspirator 1 advised Pursley during this time that Co-Conspirator 1 was not tax compliant with respect to his offshore activities.

In approximately 2000, Co-Conspirator 1 went to Panama in order to move his funds out of Banco Disa because Pursley told him that their Panamanian bank was going to fail. Co-Conspirator 1 moved Southeastern Shipping's funds from Banco Disa to BSI in Switzerland, where Co-Conspirator 1 maintained a personal account. Co-Conspirator 1 also opened a BSI account in Southeastern Shipping's name. Co-Conspirator 1 transferred those funds to Southeastern Shipping's Royal Bank of Scotland bank account in the Isle of Man, which served as the source of funds transferred to defendant Pursley as compensation for his participation in the scheme.

The Government will offer this evidence under Rule 404(b) of the Federal Rules of Evidence to show knowledge, intent, and plan.

DATED: November 15, 2018

Respectfully Submitted,

RYAN K. PATRICK
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Southern District of Texas

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on November 15, 2018, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to all counsel of record.

By: /s/ Nanette L. Davis
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